South 4 Group Fire Transition from Emergency Response to Long-Term Remediation and/or Consequence Management

Incident Overview:

On 27 November 2019, at approximately 01:00, an explosion was reported at the TPC Group Port Neches facility due to unknown causes, and 1,3-butadiene was reported to have been released. Loss of power prevented firewater and stormwater from being processed in the joint waste water treatment plant (JWWTP) and discharged over outfall 201.

Response Activities and Transition:

On Friday, December 13, 2019, the U.S. Environmental Protection Agency (EPA) Federal On-Scene Coordinator (FOSC) is transitioning this incident from the emergency response phase to the long-term remediation phase and/or Consequence Management Phase, in which the Texas Commission on Environmental Quality (TCEQ) State On-Scene Coordinator (SOSC) and/or Remediation Division will oversee and approve the remaining cleanup efforts relative to this incident.

In the event Site conditions change during the remediation and Consequence Management Phase, and another emergency response is initiated relative to this incident, the <u>facility shall notify the EPA FOSC</u>. EPA may stand Unified Command back up.

Community Air Monitoring, Air Sampling, and Surface Water Sampling:

TPC will continue air monitoring, air sampling, and surface water sampling activities in accordance with the currently approved Environmental Assessment Reduction Plan signed December 11, 2019 and the Preliminary Data Summary for the Reduction of Air Monitoring and Sampling Activities plan dated December 9, 2019 and signed December 11, 2019. Any reduction in the air monitoring/sampling activities after the date of this document will require the approval of the TCEQ SOSC and/or Remediation Division.

Impacted Tanks:

Of the 102 tanks at the TPC facility, 12 tanks were impacted and 4 destroyed. As of the December 13, 2019 evaluation, TPC identified 3 tanks with lazy emission leaks with plans being made to resolve. There's been no observed increase to air monitoring measurements in the community from these three tanks. TPC began adding an oxygen scavenger inhibitor, diethylhydroxylamine (DEHA), on December 9, 2019. There's been no observed off-site impact from these three tanks or the inhibitor operation.

Impacted Waterways:

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December 13, 2019

As of December 13, 2019, there has been visible impact to the approximate 1.89 miles downstream from the JWWTP Outfall 201 over the course of the incident response. There has not been visible impact to the 1.3 miles of canal upstream from the confluence with the Neches River. Per recommendations from the SCAT team on December 12, 2019, recovery operations in the JWWTP discharge canal are transitioning to a maintenance phase from an active recovery phase. TPC will conduct maintenance per the approved Boom Monitoring and Maintenance Plan and contain and recover any product accumulation along the canal.

Surface Water Sampling:

TPC will continue water sampling activities in accordance with the currently approved Environmental Assessment Plan, dated December 1, 2019. Any reduction in the surface water sampling activities after the date of this document will require the approval of the TCEQ SOSC and/or Remediation Division.

Debris Management / Asbestos Sampling and Management:

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TPC will continue debris management and asbestos sampling and management. Any reduction in this effort after the date of this document will require the approval of the TCEQ SOSC and/or Remediation Division.

Emergency Response Phase to Long-Term Remediation Phase Sign-off:

The EPA FOSC has transitioned the South 4 Group Fire response from the emergency response phase to the long-term remediation and consequence management phase. The TCEQ will provide the responsible party oversight for remaining activities.

Site Site ID	South 4 Group F A6TK	ire		
Site Address	2102 TX-136 Spur, Port Neches, Jefferson County, TX 77561			
EPA FOSC Date:	<u>-</u>			ADAM ADAMS, FOSC
TCEQ SOSC (Print N Date:	ame/Signature) _ _			
Effective and transmit	ted to TPC at <u>10</u>	0:00 on <u>[</u>	December 13, 20	by EPA FOSC.
TPC (Print Name/Sigi Date:	nature) _ _			

December 13, 2019